

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF MISSOURI

In Re:)	
)	
Mary Crooks,)	
)	Case No. 05-71032
)	
Debtor,)	Chapter 7
)	
Ruskin Place Apartments,)	
)	
Creditor/Movant,)	
)	DEBTOR'S ANSWER TO
vs.)	MOTION FOR RELIEF
)	
Mary Crooks,)	
)	
Respondent.)	

DEBTOR'S ANSWER TO MOTION FOR RELIEF

Comes now Debtor, Mary Crooks, by and through her attorney of record,
Jason C. Amerine, and for her Answer to Motion for Relief, states as follows:

1. That Creditor alleges Debtor is in default of two post-petition rent payments in the amount of \$1000.00.
2. That Creditor further alleges that Debtor now owes late fees in the amount of \$455.00.
3. That Debtor converted her case from a Chapter 13 bankruptcy to a Chapter 7 bankruptcy on February 15, 2006.
4. That Debtor rejected this lease in her petition and this debt is listed on Schedule F.
5. That Debtor states that she no longer resides at this address.
6. That this debt is dischargeable as a post-petition, pre-conversion debt. See *In re Gilpin*, 209 B.R. 490 (1997).

WHEREFORE, Debtor prays this Court enter an Order denying the Motion for Relief; and for such other and further relief this Court deems reasonable and necessary.

Respectfully Submitted,

Castle Law Office of Kansas City

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CERTIFICATE OF SERVICE

The undersigned hereby states that a true copy of the Answer to Motion for Relief was mailed via first class mail, postage pre-paid, or via electronic filing to the parties listed below, on this April 5, 2006.

/s/Jason C. Amerine
Jason C. Amerine #50857

Maureen Scully
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Creditor's counsel
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